

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

JAN 8 2013

ROBERT D. DENNIS, CLERK
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
BY *[Signature]* DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

ERICK DAYON DANIELS,
a/k/a E.D., a/k/a Bro,

Defendant.

CR 13-006

No. _____

Violations: 21 U.S.C. § 846
21 U.S.C. § 853

D

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Conspiracy)

From in or about February 2012, through in or about June 2012, in the Western
District of Oklahoma, the defendant,

----- **ERICK DAYON DANIELS,**
a/k/a E.D., a/k/a Bro,-----

knowingly and intentionally combined, conspired, confederated, and interdependently
agreed, together with each other, and with other persons known and unknown, to possess
with intent to distribute and to distribute 500 grams or more of a mixture or substance
containing a detectable amount of cocaine, a Schedule II controlled substance.

Manner and Means

The objects of said conspiracy were to be accomplished and were accomplished as follows:

1. During the period of the conspiracy, **ERICK DAYON DANIELS, a/k/a E.D., a/k/a Bro**, and others were members of a drug trafficking organization (DTO). One of the purposes of the conspirators' association with the DTO was to facilitate their drug activity by providing a network of individuals to accomplish the means and acts set forth herein. **ERICK DAYON DANIELS, a/k/a E.D., a/k/a Bro**, associated himself with others who acquired, or caused to be acquired, quantities of cocaine from sources in Texas, and elsewhere, for distribution in the Lawton, Oklahoma area, and elsewhere.

2. During the period of the conspiracy, members of the conspiracy frequently used cellular telephones to maintain contact with each other and with their customers to arrange for the acquisition and distribution of powder cocaine and cocaine base and/or to arrange for the collection of drug proceeds and to otherwise facilitate the conspiracy. Members of the conspiracy often placed the accounts associated with the cellular telephones in the names of other individuals, and/or periodically changed or dropped the telephone number or service, to protect themselves from being identified and their drug dealing activities from being disclosed to law enforcement.

3. Members of the conspiracy often used discrete or coded language, such as “fish” (half of any quantity of cocaine base), “dollar” or any reference to “100” (3.5 grams of cocaine base) “onion” or “zip” (ounce of cocaine base), “them things” (quantity of cocaine), “the Lab” or “the West” (house at 8101 S.W. Boatsman Avenue), and “a rack” (one thousand dollars) to attempt to conceal the illegal nature of their conversation.

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

FORFEITURE

A. The allegations contained in Count 1 of this Indictment is hereby re-alleged and incorporated for the purpose of alleging forfeiture.

B. Upon conviction of the offense alleged in Count 1 of this Indictment, defendant **ERICK DAYON DANIELS, a/k/a E.D., a/k/a Bro**, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense, including but not limited to the following:


- (1) Steyr M40, .40 caliber handgun, bearing serial number 009673;
- (2) Israel Weapon Industries, .40 caliber handgun, bearing serial number 36302799; and
- (3) any and all ammunition and magazines.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

SANFORD C. COATS
United States Attorney


DAVID P. PETERMANN
Assistant United States Attorney